

Omaha Public Power District

P.O. Box 399 Hwy. 75 - North of Ft. Calhoun Fort Calhoun, NE 68023-0399
402/636-2000

September 30, 1994

LIC-94-0185

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References: 1. Docket No. 50-285
2. Letter from NRC (T. P. Gwynn) to OPPD (W. G. Gates) dated August 25, 1994
3. Letter from NRC (T. P. Gwynn) to OPPD (W. G. Gates) dated August 31, 1994

Gentlemen:

SUBJECT: NRC Inspection Report No. 50-285/94-09 Reply to a Notice of Violation (NOV)

Reference 3 transmitted a NOV resulting from an NRC inspection conducted June 20 through July 15, 1994 at the Fort Calhoun Station. Attached is the Omaha Public Power District (OPPD) response to this NOV.

If you should have any questions, please contact me.

Sincerely,

W. G. Gates

W. G. Gates
Vice President

WGG/jrg

Attachment

- c: LeBoeuf, Lamb, Greene & MacRae
L. J. Callan, NRC Regional Administrator, Region IV
S. D. Bloom, NRC Project Manager
R. P. Mullikin, NRC Senior Resident Inspector

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REPLY TO A NOTICE OF VIOLATION

Omaha Public Power District
Fort Calhoun Station

Docket: 50-285
License: DPR-40

VIOLATION

During an NRC inspection conducted June 20 through July 15, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is listed below:

Criterion V, Appendix B of 10 CFR Part 50, states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings . . . and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

The Fort Calhoun Quality Assurance Plan, Revision 3, Section 2.1, paragraph 4.2.1, states, in part, that activities affecting quality shall be prescribed by documented instructions or procedures and shall be accomplished in accordance with these instructions or procedures.

Standing Order SO-G-6, "Housekeeping," Revision 49, issued on June 21, 1994, specified housekeeping requirements, in part, for the control of ladders and combustible materials. Section 5.2.6 of Revision 49 specified the storage requirement for ladders. Section 5.2.6 required that ladders, which are upright, may not be left unattended unless they are properly secured to ensure personnel and equipment safety.

Contrary to the above, on June 23, 1994, the inspector observed that an upright wooden step ladder was left unattended and unsecured in the main control board panel walkway.

This is a Severity Level IV violation (Supplement I) (285/9409-01).

OPPD RESPONSE

1. The Reason for the Violation

The reason for this violation was determined to be a failure to communicate management expectations to station personnel. Just prior to identification of the violation, Standing Order SO-G-6 had been revised to better establish accountability for station housekeeping requirements. However, the task of informing plant personnel of the revised requirements had not been completed.

2. Corrective Steps That Have Been Taken and the Results Achieved

In response to the housekeeping discrepancy discussed in the Notice of Violation, Maintenance Work Order (MWO) 941798 was initiated to inspect and correct any housekeeping concerns associated with station instrument panels. The MWO has been completed, with all panels being left in compliance with the requirements of SO-G-6.

A Training Hotline has been issued to supervisory personnel assigned responsibility for housekeeping areas associated with the revision of SO-G-6.

Periodic housekeeping inspections are conducted as specified in SO-G-6, and involve the Plant Manager and various department heads. These inspections provide a mechanism to reinforce management expectations with respect to housekeeping issues.

3. Corrective Steps That Will Be Taken to Avoid Further Violations

Selected department heads have been tasked with briefing their personnel regarding management's expectations for station housekeeping practices. The briefings will include a discussion of recent changes to SO-G-6, and management's expectations for all personnel with respect to housekeeping practices at Fort Calhoun Station. These briefings will be completed by October 31, 1994.

Housekeeping responsibilities of station employees, as currently covered in General Employee Training and Conduct of Maintenance Training, will be reviewed by December 31, 1994, to ensure appropriate content and ensure that emphasis is placed on management's expectations.

The storage of ladders within operating areas of the station will be addressed by installation of permanent storage locations for ladders. Locations for ladder storage racks have been identified throughout the station and the new racks will be installed by January 1, 1995.

4. Date When Full Compliance Will Be Achieved

OPPD is presently in full compliance.